

MICHAEL S. KASANOFF, LLC

ATTORNEY AT LAW

9 STILLWELL STREET
MATAWAN, NJ 07747

PHONE: (908) 902-5900
FAX: (732) 741-7528
E-MAIL: mkasanoff@att.net

December 19, 2023

VIA ECF

Honorable Zahid N. Quraishi, U.S.D.J.
United States District Court
District of New Jersey
402 East State Street - Room 4000
Trenton, NJ 08608

Re: Estate of Frances D. DeRosa v. Phillip D. Murphy, et. al.
Civ. No.: 3:22-cv-2301(ZNQ)(TJB)

Dear Judge Quraishi:

Yesterday the Court entered an Order setting forth three salient procedural points: (1) the Court will not be retaining supplemental jurisdiction over the medical malpractice claim; (2) the Court is granting Plaintiffs 30 days to file a Second Amended Complaint (“SAC”); and (3) the Court directed counsel to meet and confer within 7 days, and to advise the Court on whether the SAC will be filed, and a timetable for responses.

After reviewing the Order, I emailed DAG McGuire for purposes of scheduling a call to meet and confer. In response, I received an automated message stating that Mr. McGuire will be on vacation starting December 16, 2023, and will not be returning until January 2, 2024. During that time he will be checking emails infrequently, and will likely be unable to respond.

Thus we will be unable to meet and confer within the next 7 days. However, I assure the Court that we will meet and confer as soon as Mr. McGuire returns, and then advise the Court of our proposed schedule. Notwithstanding, I can confirm now that Plaintiffs will most definitely be filing a SAC, and should easily be able to have it filed within the Court’s 30-day deadline. We thank the Court for its consideration.

Respectfully submitted,
Michael S. Kasanoff
Michael S. Kasanoff

cc: Robert McGuire, Esq. - Deputy Attorney General